

## Optional Cover Letter

Note-1: The CDX program did not allow the simultaneous inclusion of information in both the Primary Contact Information and Technical Contact Information sections. Therefore, the Primary Contact Information section was completed with this information. John V. Massingale is both the Primary Contact and the Technical Contact.

Note-2: This TSCA bona fide notice is being submitted by DKSH North America, Inc. (DKSH) for the following chemical substance: Benzene, 1,1'-(1,2-ethanediyl)bis[2,3,4,5,6-pentabromo- [CAS RN 84852-53-9]. This substance is listed on the public portion of the TSCA Inventory and regulated under the TSCA Section 5(a)(2) Significant New Use Rule (SNUR) set forth at 40 CFR 721.536. One of the SNUR's specific restrictions is the requirement at 721.80(q) which identifies as a significant new use an "aggregate manufacture and importation volume for any use greater than that allowed by the Section 5(e) Consent Order." The SNUR does not identify the aggregate volume in the Consent Order. Therefore, in order to determine the aggregate volume limit, DKSH submits this bona fide notice under the provisions at 721.1725(b)(1) and requests that EPA provide the company with the aggregate volume identified in the Consent Order.

<b>BONA FIDE INTENT TO MANUFACTURE OR IMPORT NOTICE</b>		<b>Total Number of Pages not including attachments.</b>  <b>7</b>
<b>GENERAL INSTRUCTIONS</b>		
<ul style="list-style-type: none"> <li>You must provide all information requested in this form to the extent that it is known to or reasonably ascertainable by you. Make reasonable estimates if you do not have actual data.</li> <li>Before you complete this form, you should read the '40 CFR 720.25.'</li> <li>The accuracy of the statements you make in this notice should reflect your best prediction of the anticipated facts regarding the chemical substance described herein. Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 USC 1001.</li> </ul>		
<b>GENERAL INFORMATION</b>  You must provide the currently correct Chemical Abstracts (CA) Name of the chemical substance, even if you claim the identity as confidential. You may authorize another person to submit chemical identity information for you, but your submission will not be complete and the review will not begin until EPA receives this information.  <b>SITE INFORMATION</b>  You will be able to identify your site of manufacture and/or port of entry on the 'Submitter Site Identification' screen through the Facility Registry System. This information will display on the 'Site Information' page within this Portable Document Format (PDF).  Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence.		<b>LIST OF ATTACHMENTS</b>  The attached documents will display on the 'List of Attachments' page within the PDF. The attachment will display with the document name, document type, description and section title.  <b>CONFIDENTIALITY CLAIMS</b>  You may claim the entirety of the form as Confidential Business Information (CBI) by checking the CBI checkbox located on the 'General Document Information' screen.  The 'CBI' checkbox below will be marked (X) if you checked the CBI checkbox on the 'General Document Information' screen within the application.
I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate. I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for protection for any confidential information made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that the person submitting the claim has: <ul style="list-style-type: none"> <li>(i) taken reasonable measures to protect the confidentiality of the information;</li> <li>(ii) determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;</li> <li>(iii) a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of the person; and</li> <li>(iv) a reasonable basis to believe that the information is not readily discoverable through reverse engineering.</li> </ul> Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.		
CBI	<input type="checkbox"/>	

GENERAL INFORMATION									
SUBMITTER IDENTIFICATION									
Primary Contact Information									
Name	(prefix)	Mr	(first)	John	(middle initial)	V	(last)	Massingale	(suffix)
Job Title	Principal								
Company Name	Greenwich Chemical Consulting, Inc.								
Email Address	john@grcci.com			Phone Number	5615788110				
Mailing Address 1	3300 PGA Boulevard								
Mailing Address 2	Suite 635								
City	Palm Beach Gardens	State	FL	Postal Code	33410				
Country	US								
Technical Contact Information									
Name	(prefix)	(first)	(middle initial)	(last)	(suffix)				
Title									
Company Name									
Email Address				Phone Number					
Mailing Address 1									
Mailing Address 2									
City		State		Postal Code					
Country									
Letter of Support Submitter Information (if Applicable)									
This box will be marked (X) if you are submitting this notice as part of a letter of support submission.					<input type="checkbox"/>				
Name	(prefix)	(first)	(middle initial)	(last)	(suffix)				
Title									
Company Name									
Email Address				Phone Number					
Mailing Address 1									
Mailing Address 2									
City		State		Postal Code					
Country									

GENERAL INFORMATION -- Continued					
SUBMITTER IDENTIFICATION -- Continued					
Submitting Official Information					
Name of Authorized Official	(prefix)	(first)	<b>Lance</b>	(middle initial)	(last) <b>Croft</b> (suffix)
Job Title	Not Applicable				
Company Name	DKSH NORTH AMERICA INC.				
Email Address	lance.croft@dksh.com		Phone Number	9738105511	
Mailing Address 1	100 STIERLI COURT				
Mailing Address 2	Suite 102				
City	MT. ARLINGTON	State	NJ	Postal Code	07856
Country	US				
Submitting on Behalf of Company (If Applicable)					
Name of Authorized Official	(prefix)	(first)	(middle initial)	(last)	(suffix)
Job Title					
Company Name					
Email Address			Phone Number		
Mailing Address 1					
Mailing Address 2					
City		State		Postal Code	
Country					
STATEMENT OF INTENT:					
The 'Manufacture' and/or 'Import' checkboxes will be marked as (X) based on the selection made on the 'Statement of Intent' screen. <div style="display: flex; justify-content: space-around; align-items: center;"> <span>Manufacture (Site of Manufacture) <input type="checkbox"/></span> <span>Import (Port of Entry) <input checked="" type="checkbox"/></span> </div>					
Date of expected Section 5 notification if the result is that the chemical is not on the inventory			Not applicable		

GENERAL INFORMATION -- Continued		
<b>CHEMICAL IDENTIFICATION INFORMATION:</b>		
Chemical Name: Benzene, 1,1'-(1,2-ethanediyl)bis[2,3,4,5,6-pentabromo-		
Generic Chemical Name:		
'Chemical Abstract Service' (CAS) Registry Number	84852-53-9	
Method 1 (CASs Inventory Expert Service - a copy of the Identification report obtained from the CAS Inventory Expert Services must be submitted as an attachment to this notice)	<input type="checkbox"/>	Method 2 (Other Method) <input checked="" type="checkbox"/>
Molecular Formula (Optional)	C14 H4 Br10	

**GENERAL INFORMATION -- Continued****USE INFORMATION:**

This TSCA bona fide notice is being submitted by DKSH North America, Inc. (DKSH) for the following chemical substance: Benzene, 1,1'-(1,2-ethanediyl)bis[2,3,4,5,6-pentabromo- [CAS RN 84852-53-9]. This substance is listed on the public portion of the TSCA Inventory and regulated under the TSCA Section 5(a)(2) Significant New Use Rule (SNUR) set forth at 40 CFR 721.536. The substance is currently in use in the U.S. as a flame retardant additive.

**SITE IDENTIFICATION****SUBMITTER SITE IDENTIFICATION****Site 1****EPA Registry ID****110070208559****Site of Manufacture or Port of Entry****Port of Entry****Site Name****DKSH NORTH AMERICA, INC.****Address (number and street)****350 CLARK DRIVE****City****MOUNT OLIVE****State****NJ****Postal Code****07828****Site 2****EPA Registry ID****Site of Manufacture or Port of Entry****Site Name****Address (number and street)****City****State****Postal Code****Site 3****EPA Registry ID****Site of Manufacture or Port of Entry****Site Name****Address (number and street)****City****State****Postal Code**

Attachments List				
#	File Name	Document Type	Description	Section Title
1	FTIR scan EcoFlame B-971.pdf	Spectrum of Substance	IR Spectrum	BonaFide Document Management
2	Statement of Commercialization.pdf	Statement of Commercialization	Statement of Commercialization	BonaFide Document Management
3	Statement of Research and Development.pdf	Statement of Research and Development	Statement of Research and Development	BonaFide Document Management
4	Structure-B-971.pdf	Other	Structure of the Chemical Substance	Chemical Structure
5	CAS RN 84852-53-9.pdf	Other	CA Index Name on the Chemical Substance	ID Method